

**UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Kevin Michael Keough

CHAPTER 13

Debtor(s)

CASE NO. 1:19-bk-02506-HWV

MOTION TO AUTHORIZE WAGE ATTACHMENT

COME NOW, the Debtor, Kevin Michael Keough, by and through counsel, Dawn M. Cutaia, and respectfully represents:

1. The Debtor, Kevin Michael Keough, filed a Chapter 13 Petition on August 2, 2018.
2. The Debtor receives regular income from employment with York Area United Fire & Rescue which may be attached under 11 U.S.C. § 1326 to fund the Chapter 13 Plan.
3. The likelihood of success in this case will increase if the Motion for Wage Attachment is granted.

WHEREFORE, the Debtor respectfully requests this Court enter an Order directing the above-mentioned employer to Pay Trustee in the amount set forth in the attached Order.

Date: January 2, 2020

Respectfully Submitted,

By: **/s/ Dawn M. Cutaia**
Supreme Court ID 77965
Attorney for Debtor
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York, PA 17401
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ORDER TO PAY TRUSTEE

AND NOW, upon consideration of the above-referenced Debtor having filed a Petition under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

IT IS HEREBY ORDERED that until further Order of this Court:

Employer: York Area United Fire & Rescue
Attn: Lisa Einsig, Administrative Assistant
50 Commons Drive
York Pa 17402
717-718-2383

Shall deduct from Kevin Michael Keough income the sum of \$411.80 each bi-weekly pay, beginning with the first pay in **March 2020**, and deduct this same amount each pay thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor and remit the deducted sums to:

Chapter 13 Trustee
PO Box 7005
Lancaster PA 17604

IT IS FURTHER ORDERED that checks issued to the Trustee pursuant to this Order shall include the above-captioned case number on the face of the check.

By the Court

Judge